
PRIVACY POLICY

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our website.

Nira Alpina understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Hotel”	means Alpine Hospitality (Switzerland) AG trading as Nira Alpina
“Cookie”	means a small text file placed on your computer or device by our website when you visit our website. Details of the Cookies used by our website are set out below.
Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Information About Us

Alpine Hospitality (Switzerland) AG trading as Nira Alpina

Address: Via dal Corvatsch 76, 7513 Silvaplana-Surlej Schweiz

Email address: info@niraalpina.com

“We”

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What Data Do We Collect?

We collect some or all of the following personal and non-personal data (please also check our Cookie Policy for use of Cookies and Google Analytics):

- Name
- Address
- Email address
- Telephone number
- Payment details
- IP address

How Do We Use your Personal Data?

We use your data for our performance of a contract with you, because you have consented to our use of your personal data and it is in our legitimate business interests to use it.

Your personal data may be used for one of the following purposes:

- Supplying our products **AND** services to you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email **AND** post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us using the above contact details or unsubscribing to mailing lists in the emails received from us).
- Analysing your use of our website and gathering feedback to enable us to continually improve our website and your user experience.

With your permission and where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email **OR** telephone with information, news, and offers on our products **AND** services.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

What Are your Rights?

You have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details above.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten.
- e) The right to restrict (i.e. prevent) the processing of your personal data.

- f) The right to object to us using your personal data for a particular purpose.
- g) The right to data portability.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided below.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

How Long Will We Keep your Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- A period of 10 years on our secure internal PMS database; or
- Until such time that you consent to be on our mailing list.

We have CCTV cameras on our premises for safety and security purposes. The cameras work around the clock and the recordings are maintained for a 45 days' period. After this period the recordings are automatically erased.

You can request to have your personal data deleted from our database at any time by requesting us to do so. You can write to us directly as per contact details provided below.

How and Where Do We Store or Transfer your Personal Data?

We store your personal data in the UK. This means that it will be fully protected under the GDPR.

We collect, store and manage your personal data as described below:

- When making reservations our website takes you to our booking engine and Property Management System (PMS) where the reservations are completed. The following data is collected at the booking stage:
 - Name
 - Address
 - Email address
 - Telephone number
- The data collected on our website during the booking also requests you to choose whether you would like to be on our mailing list for marketing purposes. We also use third party booking websites such as Booking.com and Expedia who share your booking details and preferences with us. We then update our database with your personal data as per your preferences. Our database keeps record of customers who have subscribed and those who have not subscribed for marketing and related offers.
- The data of customers who have not subscribed to be on the mailing lists and who have

subscribed to be on the mailing lists are maintained on our internal PMS system for a period of ten (10) years (“minimum term”), the minimum document retention period as per applicable laws as the time of the policy being put in place.

- The data on customers who have opted to be on the mailing list is maintained until a request for unsubscribing is received from them.
- Requests to unsubscribe from the mailing list can be done by clicking on the unsubscribe link provided in emails received from the Hotel or writing to us directly as per contact provided below in “How do I contact you?”
- The subscribed list of customers is maintained until the customer opts to be removed from the list. Unsubscribing from the mailing list does not mean that the data on the customer held on our database has been deleted. After unsubscribing the customer will still be on our database as an unsubscribed customer until the earlier of:
 - The minimum term as stated above; or
 - A request being received to delete all the data.
- Any customer can request to be forgotten or removed from our database at any time upon sending us a request to do so by using the contact details below.

We also transfer your data from the PMS to Mailchimp, a US based company, for marketing purposes. Mailchimp is part of the EU-US Privacy Shield and provides data protection to standards similar to data protection in Europe.

Access to the Mailchimp account is restricted to authorised users of the Hotel such that each log in requires a verification code to be entered which is only accessible to the designated users.

Data collected on the PMS is uploaded on the mailchimp platform. The platform is then used for e-marketing purposes and maintains a parallel database to the PMS database.

Do We Share your Personal Data?

We will not share any of your personal data with any third parties for any other purposes than provide you with the products and services that you requested for, subject to the exceptions below.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We also contract with third parties to supply certain products **AND** services. These may include payment processing, accounting, and marketing. In some cases, these third parties may require access to some or all of your personal data that we hold.

Payment processing is done by a PCI DSS compliance third party and encrypted using a secure server technology. Your card details are not saved or stored by us.

We maintain a database of our customers who have subscribed/opted to be on our marketing mailing lists. We share the database with Mailchimp on a monthly basis for managing our email marketing. Apart from Mailchimp, we do not share your personal data with any other third parties for marketing purposes.

When any of your personal data is required by a third party, as described above, we will take necessary steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

How Do we use Cookies?

As is.

All Cookies used by and on our website are used in accordance with current Cookie Law.

Our website uses cookies.

By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

ABOUT COOKIES

- A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.
- Cookies may be either "persistent" cookies or "session" cookies.
- A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date).
- A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

OUR COOKIES

We use only session cookies on this website.

THIRD PARTY AND ANALYTICS COOKIES

- When you use our website, you may also be sent third party cookies.
- Our advertisers / service providers may send you cookies. They may use the information they obtain from your use of their cookies:
 - to track your browser across multiple websites;
 - to build a profile of your web surfing; and
 - to target advertisements which may be of particular interest to you.

In addition, we use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

COOKIES AND PERSONAL INFORMATION

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

BLOCKING COOKIES

Most browsers allow you to refuse to accept cookies. For example:

- in Internet Explorer you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- in Firefox you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- in Chrome, you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will, however, have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on this website.

DELETING COOKIES

You can also delete cookies already stored on your computer. For example:

- in Internet Explorer, you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>);
- in Firefox, you can delete cookies by clicking "Tools", "Options", "Privacy" and then "Show Cookies", and then clicking "Remove All Cookies"; and
- in Chrome, you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Delete cookies and other site and plug-in data" before clicking "Clear browsing data".

Again, doing this may have a negative impact on the usability of many websites.

How you can control your Personal Data?

In addition to your rights as set out above, when you submit personal data to us, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails at the point of providing your details or subsequently by writing to us directly).

How Can I Access My Personal Data?

You can ask us for details of what personal data we hold on you and request for a copy of it (where any such personal data is held).

All requests should be made in writing and sent to the email or postal addresses shown below.

We will respond to your access request within **a month** and, in any case, not more than one month of receiving it.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make an access request, please use the following details (for the attention of the General Manager):

Contact person: Fernando Insua

Address: Via dal Corvatsch 76, 7513 Silvaplana-Surlej Schweiz.

Telephone number: +41 81 838 6969

Email address: info@niraalpina.com

Changes to this Privacy Policy

We may change this Privacy policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations.

We recommend that you check this policy regularly to keep up-to-date.